

**ASSESSMENT OF
1999
CASE STATISTICAL DATA**

**LEGAL SERVICES CORPORATION
*OFFICE OF INSPECTOR GENERAL***

**SPECIAL REPORT TO THE
COMMITTEES ON APPROPRIATIONS**

July 30, 2000

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EXECUTIVE SUMMARY

Audits performed by the Office of Inspector General of the Legal Services Corporation (LSC) and a review by the General Accounting Office revealed substantial errors in the case statistics reported by grantees of the LSC. Congressional concern led to Conference report direction that the Office of Inspector General assess the accuracy of the 1999 data and report to the Appropriations Committees by July 30, 2000. (Page 1)

The assessment was based on data drawn from a randomly selected sample of 60 of 237 fiscal year 2000 LSC grantees. Data were collected from 59 grantees and on-site checks were made at 29 grantees. (Page 2)

Two grantees declined to provide the requested data, asserting, among other things, that attorney-client privilege prevented them from providing clients' names and associated legal problem code. The Inspector General issued subpoenas for the required data, but the grantees refused to comply. The Inspector General petitioned the District Court, which ordered enforcement. One grantee complied, but Legal Services for New York City filed a notice of appeal and was granted a stay of the enforcement order. (Page 4)

LSC grantees reported 1,038,662 cases closed in 1999. LSC management reduced this number by an estimated error rate of 11 percent, and projected 924,000 closed cases for 1999 in its April 2000 report. (Page 6)

Based on a detected error rate of 13 percent, the Office of Inspector General estimated that 135,027 cases should not have been reported by the grantees. We estimate that 903,635 cases should have been reported as closed in 1999. (Page 7)

TABLE OF CONTENTS

| | |
|---------------------------------|---|
| Executive Summary | i |
| 1. Background | 1 |
| 2. Methods | 2 |
| 3. Access to Records | 4 |
| 4. LSC Reported Caseloads | 6 |
| 5. Results | 6 |

APPENDICES

| | |
|--|-----|
| A. Technical Approach | A-1 |
| B. Administrative Procedures | B-1 |
| C. Assessment of Sample Representativeness | C-1 |

EXHIBITS

| | |
|--|-----|
| 1. Overstated Cases by 13 Grantees in 1997 and 1998 | 2 |
| 2. Data Elements Collected to Support Case-Level Error Assessment..... | 3 |
| 3. Data Elements Collected to Support Grantee-Level Error Assessment..... | 4 |
| 4. Summary of Case-Level Errors by Type | 7 |
| 5. Comparison of Adjustments to Total Closed Cases | 8 |
| A-1. Sample A Grantees | A-3 |
| A-2. Sample B Grantees | A-6 |
| B-1. Workflow Cascade Diagram | B-1 |
| B-2. Detailed Dataflow Diagram | B-9 |
| C-1. Comparison of Samples A and B with Grantee Population | C-4 |
| C-2. Logistic Regression Comparison of Sample A with Grantee Population | C-5 |
| C-3. Logistic Regression Comparison of Combined Samples A and B with Grantee Population | C-6 |
| C-4. Comparison of On-site Reviewed Cases with Aggregate Set of Cases | C-7 |
| C-5. Comparison of Error Rates for Advance-Notice and No-Advance Notice Sampled Cases | C-8 |

ASSESSMENT OF 1999 CASE STATISTICAL DATA

LEGAL SERVICES CORPORATION OFFICE OF INSPECTOR GENERAL

1. BACKGROUND

Congress directed that "[t]he Office of Inspector General will assess the case service information provided by the grantees, and will report to the Committees no later than July 30, 2000, as to its accuracy."¹ This report is submitted pursuant to that direction.

The mandate resulted from continuing Congressional concern with respect to the accuracy of caseload statistics reported to the Legal Services Corporation (LSC) by grantees in their annual Grant Activity Reports. Grantees annually provide LSC with various statistical data on the number of cases closed during the year. LSC reports these data to the Congress as an indicator of the grantees' and LSC's performance.

During 1998 and early 1999, the Office of Inspector General (OIG) performed 13 audits of the case statistical data submitted by grantees. These audits were initiated to determine if the grantees were providing accurate and reliable information concerning their performance. The audits disclosed that twelve grantees had overstated the number of cases closed.

In May 1999 at the request of Congress, the General Accounting Office (GAO) initiated reviews of the case statistical data provided by the five largest grantees. These reviews confirmed that the grantees' case statistical data reported to LSC had substantial errors that were similar to those errors reported by the OIG.²

At a Congressional Hearing in September 1999, the Inspector General (IG) provided a summary of overstated cases detected by the OIG audits, as shown in Exhibit 1 below. On a per grantee basis, the overstatement of cases ranged from 6 to 76 percent in 1997 and 0 to 43 percent in 1998.

¹ H. Report 106-283, 145 Cong. Rec. H12230, November 17, 1999.

² General Accounting Office, GAO/GGD-99-135R, "Legal Services Corporation: Substantial Problems in 1997 Case Reporting by Five Grantees," June 25, 1999.

Exhibit 1.
Overstated Cases by 13 Grantees in 1997 and 1998

| Error Description | 1997 | 1998 |
|--------------------------------|---------------|---------------|
| No legal services provided | 30,053 | 2,576 |
| Case not funded by LSC | 4,700 | NA |
| Clerical error | 2,692 | NA |
| Untimely closing | 1,952 | 5,620 |
| Duplicate cases reported | 969 | 1,584 |
| No client name on file | NA | 5,169 |
| Case not accepted for services | NA | 1,479 |
| Other | 999 | 389 |
| Total | 41,272 | 16,817 |

Note: Cases may have multiple errors. Total reflects cases with one or more errors.

2. METHODS

This section of the report provides a brief overview of the methods employed in this assessment. Appendix A provides a detailed discussion.

2.1 Case-Level Error Assessment

To assess the accuracy of the case statistical data reported by grantees to LSC, at the level of the national program, it was necessary to collect data from a random sample of cases. A two-stage random sampling plan, commonly referred to as cluster sampling, was implemented.³ A random sample of 30 grantees was chosen, with the probability of a grantee's selection proportional to the number of closed cases reported to LSC in 1998. The population of grantees from which the sample was chosen was the LSC fiscal year 2000 grantees. For each grantee a simple random sample of 25 cases was drawn to be reviewed on-site. This sampling plan produced a confidence interval of 95 percent and a standard error of estimate of + /-5 percent or less.

Statistical analyses of the samples of grantees and their cases confirmed that both samples' characteristics are representative of the national legal services program. See Appendix C for the details of this analysis.

Twenty-nine of the 30 selected grantees provided a complete list of cases closed in 1999, each containing the data elements listed in Exhibit 2. The 30 grantees are listed in Exhibit A-1.

³ See Cochran, W. G., (1977) *Sampling Techniques* (3rd ed.), John Wiley & Sons, New York; and Kish, L. (1965) *Survey Sampling*, John Wiley & Sons, New York.

Exhibit 2.
Data Elements Collected to Support Case-Level Error Assessment

| Data Element |
|-------------------------------------|
| Case Number |
| Date Opened |
| Problem Code |
| Closure Code |
| Case Handler |
| Office Code |
| Subrecipient Number (if applicable) |

These sample data were used in on-site reviews to assess the overall error rate in the closed cases reported. The previously found types of errors, shown in Exhibit 1, were the basis for on-site testing.

2.2 Grantee-Level Error Assessment

In addition to the accuracy of individual cases, there was a related error type termed “unsupported” cases. An unsupported case is one for which the grantee did not provide a record in its listing of closed cases. For example, if a grantee reported closing 10,000 cases to LSC, but could only list 9,500 cases in its data submission, then 500 cases would be classified as unsupported. The grantees also were given the opportunity to explain any variance between the number of cases reported to LSC and the number of cases submitted to the OIG.

The random sample of 30 grantees used for the assessment of case-level errors was not sufficient for projecting unsupported cases with the same level of accuracy and confidence as the sample of cases.⁴ A 90 percent confidence interval with ± 10 percent error of estimate was chosen, and an additional 30 grantees were selected randomly to augment the 30 already chosen for case-level error assessments. The additional 30 grantees are listed in Exhibit A-2.

The combined 60 grantees were required to submit complete lists of their closed cases. Exhibit 3 lists the data elements submitted requested of the 60 grantees.

⁴ To illustrate, a sample of 384 cases from an infinite population of cases is sufficient to achieve a 95 percent confidence interval with a standard error of estimate of ± 5 percent. However, a sample of 30 grantees from a population of 237 grantees achieves only a 95 percent confidence interval with a standard error of estimate of ± 17 percent.

Exhibit 3.
Data Elements Collected to Support Grantee-Level Error Assessment

| Data Element |
|-------------------------------------|
| Case Number |
| Client Name |
| Date Closed |
| Office Code |
| Subrecipient Number (if applicable) |

2.3 Data Security

Aware that some grantees would be concerned that the linkage of client name with a legal problem code could be considered subject to attorney-client privilege in certain instances, data management procedures were devised to isolate the clients' names from problem codes.⁵ The resulting system was similar to a so-called "Chinese Wall" used by law firms.⁶

The IG directed that the collection, maintenance and use of data was to be in accordance with formal procedures that ensured the complete segregation of client names from associated legal problem codes. Project staff with access to a client name could not gain access to the associated legal problem code, and staff with access to a legal problem code could not gain access to the associated client name.

3. ACCESS TO RECORDS

Subpoenas were issued to two LSC grantees, Legal Services for New York City and Legal Aid Bureau of Maryland, after the grantees refused to provide a listing of client names. The two grantees asserted that the "disclosure of client names would invade the attorney-client privilege and violate ethics rules – that the client names could be linked with the problem codes that had already been produced, thus revealing, outside

⁵ These data management procedures were implemented not because the OIG agreed with the stated concern, but because the OIG concluded that without these procedures some grantees would refuse to comply with the data collection, thus preventing the OIG from completing its assessment in a timely fashion.

⁶ See Appendix B for a more detailed description of the "Chinese Wall." The procedures for implementing the Wall were adapted from *Cromley v. Board of Education*, 17 F3d 1059 (7th Cir. 1994).

the attorney-client relationship, the motives behind client decisions to seek legal assistance.”⁷

On petition of the United States and the Inspector General, on June 14, 2000, the United States District Court for the District of Columbia ordered summary enforcement of two subpoenas issued pursuant to section 6(a)(4) of the Inspector General Act of 1978, as amended. The Court found the grantees’ blanket assertion of attorney-client privilege inadequate to defeat enforcement of the subpoenas, but left open the possibility that in a specific case, the disclosure of the client’s name in combination with the problem code could reveal the client’s motive for seeking representation in a manner tantamount to revealing confidential communications. The Court also rejected the grantees’ argument that the subpoenas should not be enforced because applicable rules of ethics (e.g., state rules of professional responsibility) forbid them from providing their clients’ names, and rejected the grantees’ argument that the OIG’s request for information was not reasonable.

Legal Aid Bureau of Maryland complied with the enforcement order, and an on-site review was conducted shortly thereafter. However, Legal Services for New York City filed a notice of appeal and a motion for an injunction pending appeal. The Court granted the motion, and stayed the enforcement order as it relates to this grantee, pending the outcome in the appellate court.

The exclusion of data from Legal Services for New York City affects the obtained error of estimate in a minor way⁸ because the assessment was designed to over-sample cases, in anticipation of a potential refusal to provide the required data. However, LSNY’s withholding of data taints the assessment results because the grantee is one of the largest grantees in terms of cases closed, and because the GAO review estimated the error rate in its 1997 data to be between 36 and 48 percent.⁹ Therefore, completion of the assessment there remains important, and the OIG will update this report when it can complete its work at Legal Services for New York City.

⁷ *United States v. Legal Services for New York City, et al.*, No. 00-0241 (D.D.C. June 14, 2000), 4.

⁸ The effect on the error of estimate was less than one percent.

⁹ General Accounting Office, GAO/GGD-99-135R, “Legal Services Corporation: Substantial Problems in 1997 Case Reporting by Five Grantees,” June 25, 1999.

4. LSC-REPORTED CASELOADS

LSC requires its grantees to report the total number of cases they closed during the year. LSC then aggregates these totals, makes adjustments if it deems necessary, and then reports to Congress.

The 1999 total closed case data cannot be compared with prior years' reports because LSC changed its guidance. Prior to 1999, LSC allowed grantees only to report closed cases that were funded either wholly or partially by LSC. In November 1998, LSC changed its guidance for 1999, directing grantees to report all closed cases that met LSC eligibility criteria, regardless of the source of funding.¹⁰ LSC management did not quantify the effect of this change on the reported total closed cases in its report to Congress.

In January 2000, LSC instructed all grantees "to conduct a Self-Inspection of a sample of closed cases *prior* to submitting 1999 CSR data to LSC."¹¹ LSC management adjusted the total number of reported cases by the reported error rates for each grantee, which resulted in an overall error rate of 11 percent. Grantees reported 1,038,662 closed cases to LSC for 1999. LSC management reduced the reported total by the 11 percent error rate, and reported 924,000 closed cases to Congress, a 30 percent reduction from 1998.

5. RESULTS

5.1 Overstated Cases

Of the 725 cases sampled, 87 (12 percent) had one or more errors that made them ineligible to be reported. These findings, when applied to the national total of a reported 1,038,662 closed cases, result in an OIG estimate of 124,639 overstated cases in 1999.¹²

The specific types of errors disclosed by the assessment are summarized in Exhibit 4.

¹⁰ LSC, Program Letter 98-8, November 24, 1998.

¹¹ LSC, "Serving the Civil Legal Needs of Low-Income Americans," April 30, 2000, p. 7, *italics in original*. (See also LSC, Program Letter 2000-01, January 14, 2000, regarding the self-inspection procedures.)

¹² Using the obtained error rate of 12 percent, the standard error of estimate becomes ± 2.35 percent, resulting in the estimated number of overstated cases ranging from 100,231 cases (9.65 percent) to 149,048 (14.35 percent); 124,639 (12 percent) is the single best estimate.

Exhibit 4.
Summary of Case-Level Errors by Type

| Error Type Description | Error Frequency | Percent |
|---|-----------------|---------|
| No legal services provided | 28 | 32.2 |
| Citizenship or eligible alien status not documented | 22 | 25.3 |
| Untimely closing | 20 | 23.0 |
| Duplicate case | 12 | 13.8 |
| Case not accepted for legal service | 5 | 5.7 |
| Other | 5 | 5.7 |
| File not found | 3 | 3.4 |
| Financial eligibility not documented | 2 | 2.3 |
| No client name on file | 0 | 0.0 |

Note: Cases had one or more errors each, $n=87$.

5.2 Unsupported Cases

Based on the data reported to LSC, the 59 grantees that completed their data submissions reported 440,987 closed cases, but were able to provide a list of cases totaling only 436,382 to the OIG. Thus, 4,605 cases were classified as unsupported. This total is approximately 1.04 percent of the total number of closed cases reported. Projected to the national program, this rate produced an estimated 10,387 unsupported cases nationally.

5.3 Estimated Total Cases Closed in 1999

The assessment detected an error rate of 13 percent, resulting in an estimated 135,027 cases that should not have been reported by grantees. Therefore, the OIG estimates that 903,635 cases should have been reported as closed in 1999.

Exhibit 5 provides a comparison of the LSC and OIG calculations.

Exhibit 5.
Comparison of Adjustments to Total Closed Cases

| LSC Management Analysis | Adjustment | Cases | Total Closed Cases |
|---|-------------------|--------------|---------------------------|
| Total Closed Cases reported by LSC to Congress. | | | 1,038,662 |
| Adjustment to provide "the most accurate <i>and</i> reliable data." | -11% | -114,662 | 924,000 |
| LSC OIG Analysis | | | |
| Total Closed Cases reported by LSC to Congress. | | | 1,038,662 |
| Minus Overstated Cases. | -12% | -124,640 | 914,022 |
| Minus Unsupported Cases. | -1% | -10,387 | 903,635 |

APPENDICES

APPENDIX A.

TECHNICAL APPROACH

A.1. INTRODUCTION

The OIG determined that the central purpose of the assessment is to analyze the accuracy of the case-level data being reported to LSC by its grantees. Therefore, the design of the assessment began with the determination that a random sample of cases would be used. With this foundation, extrapolation of findings to the population of cases (i.e., all cases for all grantees, in aggregate) was straightforward and statistically robust.

However, this basic design did not support the development of accuracy estimates at the level of any single grantee. An undertaking that would assess both the accuracy of the reported cases at the grantee level and at the case level was determined to be infeasible because it would involve data collection and site visits to about 200 grantees within five months.

An exception was unsupported cases (i.e., reported cases for which grantees cannot produce supporting case data), which are errors at the grantee-level and not at the case-level. Therefore the design was tailored to enable extrapolation of "unsupported" cases to the population of grantees, albeit at a lower level of confidence and with a higher expected error of estimate than for the case-level data.

The overall work entailed in the assessment commenced in October 1999 and continued through July 2000. Design work was followed by the development of automated systems to accommodate electronic data collection, which were placed online in February 2000. Online data collection took place in March and April 2000. On-site fieldwork commenced in April and continued through June 2000. Analysis and reporting were completed in June and July 2000.

A.2. SAMPLING

A.2.1. Case-Level Accuracy Assessment

The cornerstone of the assessment was a random sample of cases. To achieve this, the commonly used cluster sampling method was used to select the sample.¹³ The natural classification of cases into clusters was defined by the cases being part of the set of cases submitted by an associated grantee. Once the sample of grantees was determined, individual cases, which were to be reviewed on site, were selected at random, resulting in a two-stage random sample selection process.

The statistical criteria were to have a standard error of estimate of no more than 5 percent and a confidence interval of 95 percent. With simple random sampling, 384 cases would be sufficient to obtain this level of accuracy, regardless of population size.¹⁴ With two-stage sampling, a common approach is to add about half again as many cases, which results in a desired sample size of about 600 cases. Finally, the decision was made to over-sample by at least 20 percent to compensate for the potential loss of data from entire grantees.

The key design challenge with cluster sampling entailed the management of the tradeoff between the number of clusters and the number of cases per cluster, while still achieving the desired sample size needed.¹⁵ The final decision was to select 30 clusters (termed "Sample A") with 25 cases per cluster, resulting in the total sample of 750 cases.

This approach offered a prudent safety margin, achieving an estimated error of measurement of less than ± 5 percent and a confidence level of 95 percent, while allowing the loss of several clusters before jeopardizing the assessment.¹⁶ Exhibit A-1 provides a list of grantees in Sample A.

¹³ The interested reader is referred to Cochran, W. G., (1977) *Sampling Techniques* (3rd ed.), John Wiley & Sons, New York, which is a seminal reference for sampling designs, especially chapters 9 and 10.

¹⁴ This statement applies to all large populations. In cases where a sample of 384 would exceed 5 percent of the population, the methods of determining sample size must be based on techniques developed to support sampling from finite populations. See Cochran (1977) or Kish, L, (1967) *Survey Sampling*, John Wiley & Sons, New York.

¹⁵ See Babbie, E. (1990) *Survey Research Methods* (2nd ed.), Wadsworth Publishing, Belmont, California.

¹⁶ The potential loss of clusters was not to be ignored and every effort was to be made to ensure none of the clusters were lost. Empirical tests of the representativeness of the sample with and without any lost clusters were planned to determine if there was any adverse effect beyond the loss of cases per se.

Exhibit A-1.
Sample A Grantees

| Grantee Name | City | State | Closed Cases |
|---|----------------|-------|--------------|
| Legal Services Corporation of Alabama Inc | Montgomery | AL | 12,521 |
| Legal Aid Society of Orange County Inc | Santa Ana | CA | 11,474 |
| Legal Services of Northern California Inc | Sacramento | CA | 17,518 |
| Colorado Legal Services | Denver | CO | 18,569 |
| Statewide Legal Services of Connecticut | Middletown | CT | 17,432 |
| Neighborhood Legal Services Program of D.C. | Washington | DC | 1,917 |
| Gulfcoast Legal Services Inc | St. Petersburg | FL | 5,048 |
| Legal Services of North Florida Inc | Tallahassee | FL | 3,573 |
| Northwest Florida Legal Services Inc | Pensacola | FL | 3,613 |
| Georgia Legal Services Program | Atlanta | GA | 14,811 |
| Legal Services of Northwest Indiana Inc | Gary | IN | 1,732 |
| Kansas Legal Services Inc | Topeka | KS | 15,247 |
| Appalachian Research & Defense Fund of Kentucky | Prestonsburg | KY | 4,321 |
| Legal Aid Bureau Inc | Baltimore | MD | 10,304 |
| Legal Aid and Defender Association of Detroit | Detroit | MI | 2,761 |
| Meramec Area Legal Aid Corporation | Rolla | MO | 1,880 |
| Central Mississippi Legal Services | Jackson | MS | 1,052 |
| Legal Services of North Carolina Inc | Raleigh | NC | 13,559 |
| Legal Services for New York City | New York | NY | 17,784 |
| Monroe County Legal Assistance | Rochester | NY | 4,466 |
| Southern Tier Legal Services | Bath | NY | 1,221 |
| Legal Aid of Western Oklahoma | Oklahoma City | OK | 10,290 |
| Legal Services of Eastern Oklahoma | Tulsa | OK | 6,822 |
| Puerto Rico Legal Services Inc | Santurce | PR | 54,568 |
| Rhode Island Legal Services Inc | Providence | RI | 3,999 |
| Neighborhood Legal Assistance Program | Charleston | SC | 4,143 |
| Palmetto Legal Services | Columbia | SC | 3,084 |
| Southeast Tennessee Legal Services | Chattanooga | TN | 2,213 |
| Coastal Bend Legal Services | Corpus Christi | TX | 5,661 |
| Gulf Coast Legal Foundation | Houston | TX | 7,314 |
| Mean | | | 9,297 |
| Median | | | 5,354 |
| N= 30 | | | |

The first stage of the sampling began with the random ordering of grantees, keeping their associated cases together. Lacking the actual cases (because their submission depended on the selection of the sample), the number of cases closed and reported in 1998 was used as a proxy for the expected number of cases closed in 1999. Each grantee's cases were treated as a group and kept together from a mathematical perspective. Each grantee was assigned a random identifier, which was used to sort them randomly. Once the grantees' cases were randomly sorted, the expected total closed cases closed for 1999 was divided by 30 (the number of clusters) to determine the sampling interval. Next, a random offset into the first interval was computed to ascertain the first

case to be selected. Once the initial random case per cluster was selected, the associated grantee became known, and each case became the centroid of the sample of cases for the given grantee.

With this method, the probability of selecting any given grantee was proportional to the number of closed cases reported by the grantee in 1998. This approach maximized the random selection of larger programs, on average, and minimized the random selection of smaller programs. By definition, the larger programs contributed more total cases to the aggregate total reported by LSC to Congress, so over-sampling the larger programs would have the salutary effect of making the sample more representative of the major contributors to the national program's total, while each grantee actually contributed the same number of closed cases to the sample.¹⁷

The next stage of sampling took place when the detailed lists of cases closed in 1999 were obtained from the selected grantees. It was determined that a simple random sample of cases from each selected grantee would be completed, establishing two levels of complete randomization in the final case selection process. To accomplish this random selection, each grantee's data records were extracted from the "Codes" database into a Microsoft® Excel spreadsheet. Then each case was assigned a random identifier, which in turn was used to sort the cases into random order. The total number of cases was then divided by 25 (the number of cases to be selected) to establish the sampling interval. Then a random number was calculated to determine the first case to be chosen in the first sampling interval. The remaining 24 cases were selected by choosing every n^{th} case, where n is the sampling interval. Finally, five additional cases were selected at random, from the main office's set of cases. In this way, 30 cases in total were selected for each grantee.

A.2.2. Grantee-level Accuracy Assessment

An important type of error, previously reported by the OIG, is that of unsupported cases. These were defined as cases that the grantee reported to LSC as part of their annual report, but for which the grantee did not produce the supporting data when requested by the OIG. As

¹⁷ Note that LSC management advised the OIG that 237 grantees would compose the sample frame (i.e., population). Adjustments were made to the 1998 data, which were obtained from 256 grantees, to bring the expected total cases into line with the remaining 237 grantees, by aggregating service area data.

such, these errors contributed to the overall miscounting of cases, but were not case-level errors.¹⁸

With 237 grantees in the population, a sample of 30 grantees is not sufficient to achieve as high a level of confidence or as low an estimated error of estimate as demanded by the Inspector General. To illustrate, a sample of 384 cases from a population of 1,000,000 cases is sufficient to achieve a 95 percent confidence interval with a standard error of estimate of ± 5 percent. However, a sample of 30 grantees from a population of 237 grantees only achieves a 95 percent confidence interval with a standard error of estimate of ± 17 percent.

Therefore, an additional sample of 30 grantees (termed "Sample B") was selected from the remaining 207 grantees, following the same procedures as were followed for selecting Sample A. Exhibit A-2 provides a list of grantees included in Sample B.

Data from the combined set of 60 grantees from a population of 237 produced an estimate of nationwide unsupported cases with a 90 percent confidence interval and ± 10 percent maximum error of estimation.¹⁹

¹⁸ If the case data can be produced for inspection, then the case is "supported." Note, however, that supported cases may have other errors that call into question their being counted toward the total cases closed.

¹⁹ To achieve a 95 percent confidence interval with ± 5 percent accuracy would require a sample of 152 grantees, which was infeasible within time and funding constraints.

Exhibit A-2.
Sample B Grantees

| Grantee Name | City | State | Closed Cases |
|---|----------------|-------|--------------|
| Southern Arizona Legal Aid Inc | Tucson | AZ | 6,909 |
| Bay Area Legal Aid | San Francisco | CA | 5,586 |
| California Rural Legal Assistance Inc | San Francisco | CA | 8,622 |
| Channel Counties Legal Services Association | Oxnard | CA | 1,098 |
| Greater Bakersfield Legal Assistance | Bakersfield | CA | 3,016 |
| San Fernando Valley Neighborhood Legal Services | Pacoima | CA | 12,197 |
| Legal Services of Greater Miami Inc | Miami | FL | 4,306 |
| Atlanta Legal Aid Society Inc | Atlanta | GA | 11,608 |
| Land of Lincoln Legal Assistance Foundation | Alton | IL | 9,682 |
| Legal Assistance Foundation of Chicago | Chicago | IL | 18,565 |
| Southeast Louisiana Legal Services Corporation | Hammond | LA | 2,417 |
| New Center for Legal Advocacy Inc | New Bedford | MA | 2,198 |
| Pine Tree Legal Assistance Inc | Portland | ME | 11,050 |
| Lakeshore Legal Aid Inc | Clinton | MI | 5,165 |
| Legal Aid of Central Michigan | Lansing | MI | 3,720 |
| Legal Services of Eastern Michigan | Flint | MI | 7,611 |
| Legal Services of Northern Michigan Inc | Petoskey | MI | 3,722 |
| Southern Minnesota Regional Legal Services Inc | St. Paul | MN | 11,667 |
| North Mississippi Rural Legal Services Inc | Oxford | MS | 3,844 |
| Legal Aid Society Inc | Omaha | NE | 1,944 |
| Camden Regional Legal Services Inc | Camden | NJ | 4,524 |
| Legal Aid Society of Mid-New York Inc | Utica | NY | 2,860 |
| Allen County-Blackhoof Area Legal Services Assoc. | Lima | OH | 728 |
| Legal Services of Northeastern Pennsylvania Inc | Wilkes-Barre | PA | 2,756 |
| Legal Services of South Central Tennessee | Columbia | TN | 628 |
| Legal Services of Upper East Tennessee Inc | Johnson City | TN | 3,144 |
| East Texas Legal Services Inc | Nacogdoches | TX | 2,454 |
| Utah Legal Services Inc | Salt Lake City | UT | 2,451 |
| Southwest Virginia Legal Aid Society Inc | Marion | VA | 1,987 |
| Northwest Justice Project | Seattle | WA | 19,924 |
| Mean | | | 5,879 |
| Median | | | 3,783 |

N= 30

A.3. DATA COLLECTION

Data collection proceeded in two phases, with Phase 1 being electronic data submissions and Phase 2 being on-site fieldwork. Phase 1 comprised two data calls: Data Call 1 was issued to the Sample A, requesting their data using internet mail (email) attachments containing lists of cases closed and reported in 1999; Data Call 2 included the 30 grantees from Sample A plus the additional 30 Sample B grantees necessary to support the analysis of unsupported cases.

A.3.1. Electronic Data Collection

For Data Call 1, each Sample A grantee was asked to provide a complete list of its closed cases, which had been used to support its annual report to LSC. The principal data elements were case number, problem code, date opened, and closure code. For Data Call 2, each of the combined Samples A and B grantees was asked to provide a complete list of its closed cases, including case number, client name, and date closed. For both data calls, office codes and subrecipient numbers were requested to ensure the cases lists were kept consistent. Grantees were directed to provide a transmittal cover letter with each data submission, providing supporting information about the submission (e.g., the number of cases being submitted).²⁰

Recognizing that some grantees would be concerned that the concatenation of client name with a legal problem code could be considered subject to attorney-client privilege in certain instances, data management procedures were devised to isolate the clients' names from problem codes.²¹ The resulting system was similar to a so-called "Chinese wall" used by law firms.²²

A.3.2. On-Site Data Collection

Each of the 30 Sample A grantees selected for on-site data collection was contacted two business days prior to arrival and provided a list of 25 cases to be pulled from its files for assessment. The cases included those from the main office as well as from branch offices, therefore two-day's notice was given to ensure the grantee had time to assemble these cases at the main office prior to the assessment team's arrival.

Upon arrival, a set of five additional cases was requested. These five cases were randomly selected from the main office's list of cases, in order to minimize the time and effort needed to comply with this on-site request. These additional cases were used to assess the consistency of the data from the 25 advance-notice cases with the five additional on-site cases. The additional five cases served as a check that would be used to

²⁰ The transmittal letters and data submission procedures are discussed in Appendix B.

²¹ These data management procedures were implemented not because the OIG agreed with the stated concern, but because the OIG concluded that without these procedures some grantees would refuse to comply with the data collection, thus preventing the OIG from completing its assessment in a timely fashion.

²² A more detailed description of the "Chinese Wall" and associated procedures may be obtained by referring to Appendix B of this report.

identify the possibility that a given grantee had made corrections to the selected cases after receiving notice of the sampled cases.

An OIG auditor led each assessment team. At some grantees' sites, a contracted auditor accompanied the OIG lead auditor; at other sites, the entire team was composed of OIG audit staff members. Prior to initiating the site visits, OIG staff prepared a procedures manual that was used to guide training sessions for the team members.

Once on site, the team members worked with each grantee's executive director or designee and individual case handlers to determine the accuracy of the individual cases. Key checks that were completed in the field included documentation that:

- A case file was maintained for each reported case;
- The client's name had been determined and documented (but without reviewing the name itself);
- The client was accepted for representation by the grantee;
- The client's citizenship or alien eligibility was determined (where applicable);
- The client's income eligibility was determined (where applicable);
- Legal services were provided; and
- Legal services were completed during 1999.

In addition, the team sought to determine if any sampled case was reported more than once (i.e., duplicate cases). Duplicate cases were defined as multiple cases for the same individual with the same or, in some limited circumstances, a related problem code.

Duplicates are prohibited by LSC case-reporting guidance.²³ LSC requires the coding of recurrences as a single case, with some exceptions applying (such as the end of the grantee's reporting year intervening between the closing of the preceding case and the opening of the succeeding case).

²³ LSC provides guidance in its *CSR Handbook* (1999 Edition) and *Program Letters*, as well as personal communications with grantees.

At the conclusion of the on-site work, a copy of the results was provided to the grantee's executive director or their designee. The team explained the error rate should not be used to judge the grantee's individual performance and reminded the grantee that their error rate would not be reported separately. The team discussed its case analyses and reviewed specific points or additional information provided by the grantee, before leaving. To the greatest extent possible, the grantee agreed with the analyses by the on-site team prior to the team's departure.

A.4. DATA IMPORT

All grantee data files were translated to Microsoft® SQL Server 7.0 database tables using the system-provided data translation services. The translated files were carefully reviewed for internal duplicates (i.e., the same case number being reported two or more times) and other errors of transmission or translation. Given the multiple data formats that were submitted, great care was taken in determining if the translation to the OIG database was complete and accurate. Multiple reports and checks were applied to each submitted file, including a formal signoff process for each submission. Whenever there were apparent discrepancies between transmittal letters and the grantee's submitted file's(s') contents, an electronic mail message was prepared and submitted to the grantee for its clarification or correction.²⁴

Missing data are a common problem in survey work. For this assessment, only a relative handful of data cases are missing and very few data items within cases are missing. Therefore, missing data does not significantly affect the statistical analyses of the collected data.

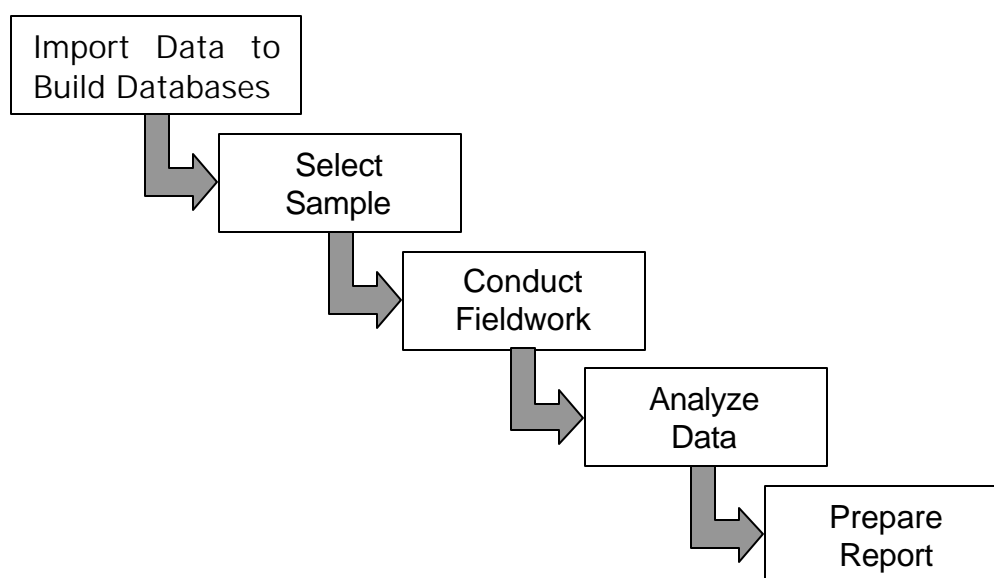
²⁴ The discussion of the data management system and associated procedures is presented in Appendix B of this report.

APPENDIX B. ADMINISTRATIVE PROCEDURES

B.1. WORKFLOW PROCESSES

The overall plan of action to support the assessment of accuracy comprises the five major tasks as shown in Exhibit B-1 following:

**Exhibit B-1.
Workflow Cascade Diagram**



Each of these tasks is discussed in a separate section below. In addition, each of these major tasks will be referenced to the Detailed Dataflow Diagram as shown in Exhibit B-2 (attached).

B.1.1. Import Data to Build Databases

Processes 1 through 6 in the dataflow diagram address data import. These processes took the raw data files submitted by grantees and built the “Codes” and “Names” databases, prompted by Data Call 1 (DC1) and Data Call 2 (DC2) respectively. Once these databases were built, case sample selection and other preparation for fieldwork was undertaken on a grantee-by-grantee basis. In addition, the data import process involved flows of information from two, overlapping groups of grantees: DC1 from Sample A, a set of randomly chosen grantees who were visited, and DC2 from both Sample A and Sample B, a set of randomly chosen grantees who will provide information to inform the analysis of unsupported cases.

Process 1 received the Codes data elements from Sample A (the grantees who were visited for on-site data collection). It was anticipated that each grantee would send one or more electronic files containing their closed case data, either in aggregate or by office. Uniquely identifying information was requested, including the recipient number, office number, and case number. These data elements were used to create a unique identifier (UID) for each case’s record in the database. In subsequent data processing steps, the UID was used to match records for various reporting and analytic purposes. Grantees and developers of their case management systems were informed of the planned use of these codes.

Processes 2 and 3 were used to pre-load the Names database with the UID for each of Sample A data records stored in the Codes database. This step ensured that the subsequent DC2 data import process matched the UIDs already on file in the Codes database.²⁵

Process 4 received the Names data elements from Samples A and B. If records were included in DC2 that could not be matched by UID, a “no match” file was prepared and returned via email to the grantee. Then the grantee was responsible for resolving the discrepancy in its data submissions.

Note that the Sample B data records did not need to have a UID recorded in the Codes database because there was no matching needed or

²⁵ Note that the “Wall” prevents direct access from the “Codes” to the “Names” databases. The linkage between the two databases, therefore, always involves two distinct and separate processes (one inside the wall and one outside) and one temporary data file to pass between the processes via diskette. Whenever linkages or passing of data are mentioned in this memo, this approach is meant.

possible. As such, a UID was created during data import for the Sample B data records that did not involve accessing the Codes database.

Processes 5 and 6 were used to pass the Date Closed data element from the Names database to the Codes database, completing the loading of the Codes records.

The primary data checks applied to the input file were related to handling missing data and physically duplicate records (defined as case-level client records that have the same recipient number, office number, and case number).²⁶ Missing data and physically duplicate records were reported back to the grantees as defects in their submissions, lowering their closed case totals accordingly. The grantee was instructed to send a new file or to explain the variance.

B.1.2. Select Sample

Prior to commencing the tasks discussed in this memo, each of the grantees in Samples A and B were selected randomly, with probability of inclusion proportional to sample size. Sample selection included processes 7 and 8 in the dataflow.

Case-level sampling relied on the data from each Sample A grantee to develop a sample frame (list of cases) by grantee. For each grantee a simple random sample of 25 cases was drawn, as a primary sample, with an additional 5 cases drawn from the headquarters office of the grantee to be visited, as a control. The Codes database was updated to indicate the records chosen for these samples, recording a 1 or 2 respectively as the record's sample status. All other records in the Codes database defaulted to a value of zero (0) for the sample status.

It was determined *a priori* that the Codes database would be primary, thus DC1 was considered the benchmark for judging the data for Sample A grantees for DC2. When there was a DC1 to DC2 variance for a grantee (e.g., more or fewer cases reported in DC1 than in DC2) then the grantee was asked to resolve the difference. To the greatest extent possible, the Date Closed information for matching DC2 records were used to update the Codes data records.

²⁶ Physically duplicate cases were distinct from the duplicate case checks performed by the auditors. The auditors' check for duplicates was based on a case having the same client name and legal problem code.

B.1.3. Conduct Fieldwork

The fieldwork began with preparations for the site visits (dataflow processes 8, 9, and 10), actual work done in the field (process 11), and updates to the Codes database of the findings (12). Process 13 produced a variance report on demand.

Process 8 accepted a Microsoft® Excel workbook with a list of sampled cases, denoted by their UIDs, from Process 7. Process 8 then used a Microsoft® Visual Basic for Applications module to add a worksheet to the workbook, containing a list of sampled case numbers and the case numbers of all cases that had the same client name. Process 9 merged these data with additional data elements from the Codes database, producing a Candidate Duplicates worksheet.

Process 10 denoted the other steps taken by the audit staff in preparing to conduct the fieldwork. These steps included reviewing other data submitted by the grantee (e.g., annual reports and audits), as well as the data import processing that had taken place in support of this assessment. Process 11 was used to denote the work done in the field.

In the field, the audit team collected data using the Excel spreadsheet. This spreadsheet included various data checks to reduce input errors. The auditors addressed the full range of errors for each case, except in circumstances where the check was inapplicable under LSC guidelines or the check could not be completed (e.g., the case file could not be located, which is an error itself).

Process 12 handled the update of the Codes database with the data from the fieldwork.

B.1.4. Analyze Data

Two distinct analytic paths are embedded in the dataflow. Processes 13 and 14 were involved in the analysis of unsupported cases, while the statistical analysis of the Codes data was handled within Process 15. Note that process 14 was shown as feeding its analyses into process 15 in the dataflow, though it could equally have been shown as sending its findings directly to process 16, Prepare Report.

The analysis of unsupported cases relied on the aggregated number of closed cases reported to LSC and to OIG, via transmittal letters and grant activity reports, as well as the data files submitted to OIG. A key output of the unsupported analysis was an estimate of the number of closed

cases reported to LSC that were not supported by the grantees' files. Since unsupported cases, by definition, cannot be assessed at the case-level, these analyses were undertaken at the grantee level.

The analysis of case-level error checks were conducted using SPSS® for Windows, version 10.

B.1.5. Prepare Report

Process 16 signaled the completion of the assessment, with delivery of the Congressionally mandated report by July 30, 2000.

B.2. TRANSMITTAL PROCEDURES

The entire population of grantees was contacted using internet electronic mail (email) on February 2, 2000, with an explanation of the data collection procedures that would be followed in March. The data elements required for both Data Call 1 and Data Call 2 were explained. It was anticipated that all data would be submitted electronically using internet mail (email) attachments, however, two post office boxes were provided for postal delivery of diskettes.

On February 28, 2000, the OIG sent a notice to all grantees via email that provided data submission guidance. This email included information on automated procedures that had been developed to support data extraction from the grantees' databases. These automated procedures were developed by some of the major providers of case management systems under contract to the OIG and were distributed via the OIG website and via the individual vendor's websites.

On March 2, 2000, Data Call 1 was issued to the Sample A grantees using email. Data Call 2 was released to the Sample B grantees on March 6. A post office box was provided for diskette submissions.

The OIG provided technical support for grantees that had questions or difficulty making their submissions. In addition, a separate post office box was provided for submission of Data Call 2 data via diskette.

B.3. DATA SECURITY

The OIG made the protection of the data a high priority. All databases were protected by passwords with only a limited number of personnel having any access to the databases. Furthermore, based on the *a priori* assumption that some grantees might consider disclosure of the

combination of client name and problem code (as such terms are defined in LSC's *CSR Handbook*, 1999 Edition) to infringe attorney-client privilege, the OIG implemented a screening procedure similar to a "Chinese wall"²⁷ to keep problem codes separate from the cases' associated client names.

Specifically, the Inspector General (IG) directed that the OIG's collection, maintenance and use of data was to be in accordance with formal procedures that ensured the complete segregation of client names from associated legal problem codes such that any OIG personnel (which included OIG staff and contractors) with access to a client name shall not gain access to the associated legal problem code, and any personnel with access to a legal problem code shall not gain access to the associated client name. Note that although the OIG recognized that only a limited subset of problem codes have the potential for impinging on attorney-client privilege, the data collection plan was designed to prevent any such concatenation, whether such a concatenation would appear to be privileged or not.

To achieve this outcome, the IG published a formal "Screening Directive. The key components of the screening directive included the following:

1. Data related to cases ("Codes" data), but not including client names, received or maintained in electronic format was to be maintained by the Codes Data Team. Passwords were used to control access to Codes Data on electronic hardware and were known only to the Codes Data Team. Printed copies of Codes Data were accessible only to the Codes Data Team and were kept in a locked safe when not in use.
2. Data that included client names ("Names" data) received or maintained in electronic format were maintained by a team of OIG personnel (Names Data Team) separate from any OIG personnel with access to Codes Data (Codes Data Team). Electronic Names Data were not to be maintained on the OIG local area computer network, but instead were maintained on a separate notebook computer. A password was

²⁷ More generally, a "Chinese wall" is used to prevent the perception that an "insulated area of a firm or company has in fact used or will be in the position to use confidential information possessed by another part of the same firm or company." (Aitken, L. (1992) Chinese Walls and Conflicts of Interest, 18 *Monash University Law Review*, 91, 93.) The procedures for implementing the Wall within the OIG were adapted from *Cromley v. Board of Education*, 17 F3d 1059 (7th Cir. 1994).

necessary to access Names Data on electronic hardware; this password was known only to the Names Data Team. Printed copies of Names Data were accessible only to the Names Data Team and were kept in a locked safe when not in use. In addition, the notebook computer containing the Names database was kept in this locked file cabinet when not in use.

3. The Codes Data Team and the Names Data Team did not share personnel. Furthermore, the Names Data Team was prohibited from discussing or otherwise sharing the specific client names maintained in the Names Data with the Codes Data Team, any other OIG personnel, or any other person. In addition, the Names Data Team was required to take any and all precautions reasonably necessary to avoid the inadvertent disclosure of client names. Likewise, the Codes Data Team was prohibited from discussing or otherwise sharing the specific legal problem codes maintained in Codes Data with the Names Data Team. In addition, the Codes Data Team was required to take any and all precautions reasonably necessary to avoid the inadvertent disclosure of legal problem codes to the Names Data Team. The Codes Data Team was allowed to discuss or share Codes Data with OIG personnel who were not designated as a member of the Names Data Team on a need to know basis. Furthermore, any OIG personnel receiving Codes Data, was subject to all restrictions on the Codes Data Team.
4. OIG Personnel who were not designated as a member of the Names Data Team were not to discuss with any member of the Names Data Team specific client names in the Names database and were not in any way to attempt to access such client names.

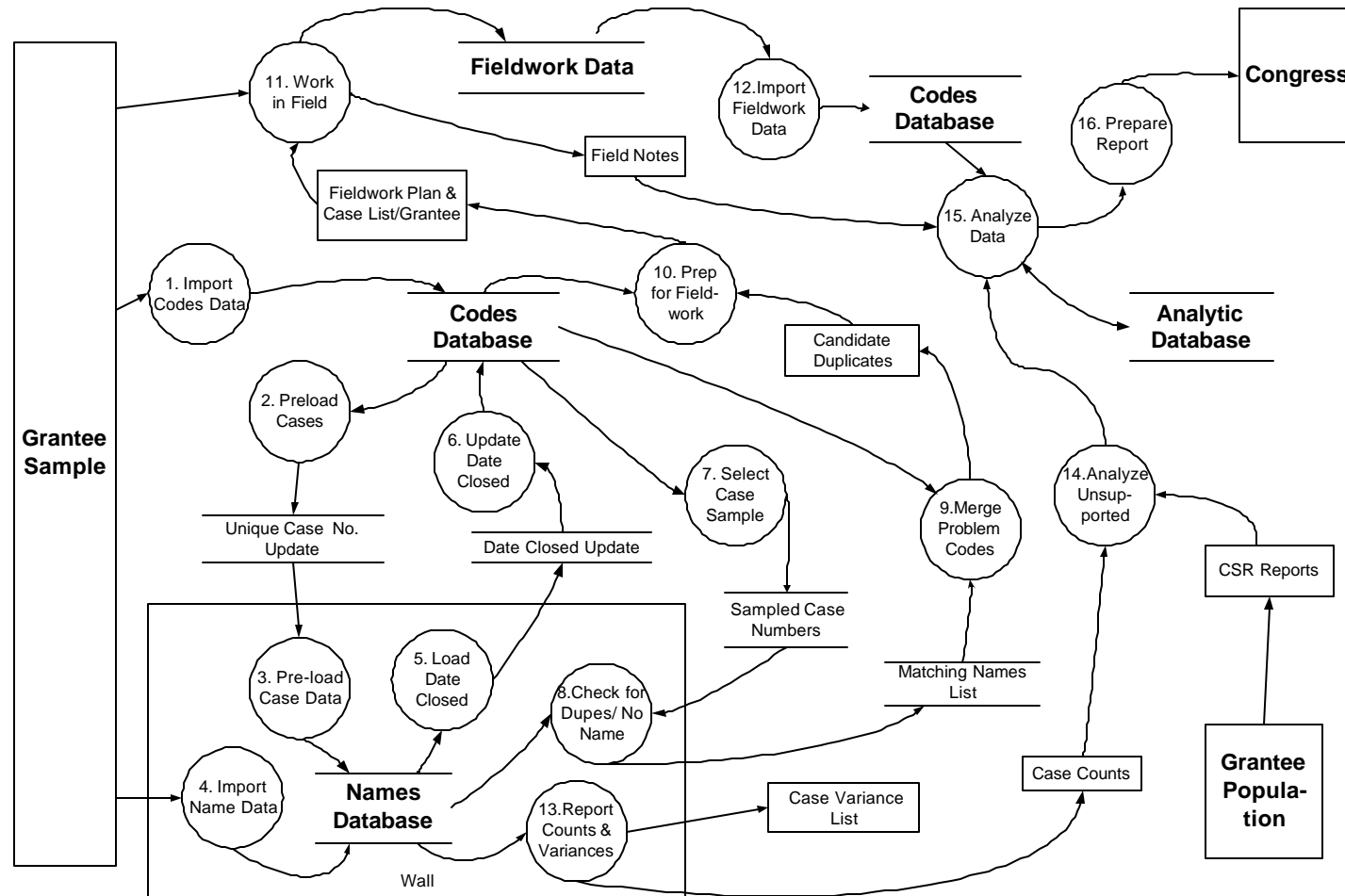
Any OIG employee who intentionally violated any of the terms in the screening directive was subject to immediate termination of employment. In addition, on completion of the assessment, the members of the Codes Data Team and the Names Data Team are required to attest, under oath, to their adherence to the procedures directed thereby.

Questions that required access to client names (e.g., checking for potential duplicate cases) were formulated in terms of a list of case numbers that were transported “inside” the Wall; with the answers returned from inside the Wall in terms of a list of case numbers with the same name, but without reporting the client’s name itself. In this way, no one “outside” the Wall had access to records that contain the client name; and no one “inside” the Wall had access to records that contain the problem code for a given case. In this way, no one was able to create a list of client names and their associated problem codes.²⁸

Finally, the OIG committed to deleting the client name data “inside” the Wall as soon as practical. Accordingly, these data were deleted in late July 2000.

²⁸ The OIG did not institute these procedures because it agreed with the stated concern regarding concatenation of name and problem code. Nonetheless, the data collection plan was designed to prevent any such concatenation, whether such a concatenation would appear to be privileged or not.

Detailed Dataflow Diagram



Note: Codes Database is shown twice to simplify graph.

APPENDIX C.

ASSESSMENT OF SAMPLE REPRESENTATIVENESS

C.1. INTRODUCTION

This appendix provides an empirical analysis of the representativeness of the samples, completed for Sample A (grantees to be visited on site) and Sample B (grantees who provided data for the analysis of unsupported cases), as well as the actual cases assessed. In addition, as an internal consistency check, the formal sample of 25 cases was augmented by an additional of 5 cases that were requested once the assessment team was on site.

Thus, there were three levels of representativeness addressed in the design of the evaluation:

1. **Sampled Grantee:** Are the sampled grantees' programs representative of the population of grantees?
2. **Sampled Case:** Are the sampled cases representative of the cases handled by grantees in aggregate?
3. **Within Grantee:** Is there a difference in the error rate for cases sampled when advance notice is given versus no advance notice?

C.2. SAMPLED GRANTEE ANALYSIS

The salient dimensions of representativeness of the samples of grantees' programs that were analyzed included the following:

- sex of clients;
- ethnicity of clients;
- age of clients; and
- service received, as indicated by closure codes.

The associated null hypotheses for these data items was framed as follows, "There is(was) no mean difference between the sample of grantees and the entire population of grantees with respect to the proportion of cases closed," with respect to sex, ethnicity, age, or closure code.

Given the random sampling method employed, the expectation was that the null hypothesis would be accepted in all instances, meaning that the sample is not statistically different from the population of grantees. The a priori significance level for rejecting the null hypotheses (i.e., alpha level) was set at 0.05, two-tailed.

Exhibit C-1 illustrates the univariate chi-square analyses, which were performed using Microsoft® Excel 2000. Note that all counts were converted to percentages prior to entering the analyses. This step was necessary to eliminate spurious significant statistical comparisons that would be attributable to unequal numbers of cases being closed by grantees.²⁹

The characteristics of the cases reported by grantees that were tested included the gender, ethnicity, age, and level of service provided. These demographic data were provided by grantees to LSC, as part of their annual grant activity report. Subsequently, LSC forwarded these data to the OIG.

As may be seen in Exhibit C-1, none of the chi-square analyses achieved significance (which would be indicated by a significance value of 0.05 or less). Therefore the related null hypotheses were accepted, demonstrating the representativeness of the samples for Data Call 1 and Data Call 2, using chi-square.

Another statistical test of the representativeness was completed using the method of logistic regression. With logistic regression, all of the characteristics of the cases were compared simultaneously to form a multivariate prediction equation, instead of testing each characteristic separately, as was the case with the chi-square. Exhibits C-2 and C-3 summarize the logistic regressions performed on these data using SPSS® for Windows, version 10. Using the various data elements available, the statistical procedures did not result in an equation that would predict whether a given grantee was a member of either sample when compared to the population. This result further strengthens the empirical demonstration that the samples were representative of the population.

Finally, it may be noted that the empirical representativeness tests reported above compare the individual samples for Data Call 1 and Data Call 2 with the population of grantees as whole. It may be asked

²⁹ Compounding the effect of unequal numbers of closed cases between grantees, the sample was selected with the probability of inclusion proportional to the size of the grantee's program, resulting in the average sampled grantees being larger than the average grantee that was not sampled.

whether the two samples are themselves statistically different from each other. Statistical analyses were conducted that showed there were no statistically significant differences between the two samples.

C.3. SAMPLED CASE ANALYSIS

The sample of 750 cases that composed the primary analytic set was drawn from a population of 277,155 reported closed cases.³⁰ To empirically test whether the sample of cases varied in some systematic way from the aggregate set of closed cases submitted by the sampled grantees, the sample of cases was compared to the aggregate set of cases with respect to problem category and closure code (a proxy for the level of service received). Exhibit C-4 summarizes these analyses.

This analysis obtained no significant difference between the sample of cases and the aggregate set of cases.

C.4. WITHIN GRANTEE ANALYSIS

The data collection procedures included giving grantees two workdays' notice of the cases to be reviewed. The list of 25 randomly selected cases was delivered by fax ("Advance-Notice" sampled cases). Although the grantees were instructed to make no modifications to the selected case files and were required to affirm that they had complied with this instruction, the risk remained that a case handler or other staff person with the opportunity to review and correct deficiencies in their files might do so. Therefore, the design of the evaluation included the selection of an additional 5 cases from the main office (where the on-site reviews were to take place), which were announced to the grantees upon arrival ("No-Advance-Notice" sampled cases). In this way, the opportunity for the grantee to make corrections to the cases was greatly diminished.

The chi-square analysis of the data from the 29 grantees that complied with the data calls is summarized in Exhibit C-5 that follows. As may be seen, there was no statistically significant difference between the error rates for Advance-Notice and No-Advance-Notice sampled cases; their error-rates were 11.9 and 12.9 percent respectively. This result provides empirical support for grantees' affirmations that the sampled cases were not modified in preparation for the on site assessments.

³⁰ Legal Services for New York City did not provide data, therefore the total closed cases for these analyses was reduced to 725.

Exhibit C-1.
Comparison of Samples A and B with Grantee Population

| | | Grantee Sample | |
|--|--------------------------------|---------------------|--------------------------|
| Client Characteristics | Grantee Population (n= 237) | Sample A (n= 30) | Samples A & B (n= 60) |
| Gender | | | |
| Men (%) | 26.4 | 26.2 | 26.8 |
| Women (%) | 73.6 | 73.8 | 73.2 |
| Total (%) | 100.0 | 100.0 | 100.0 |
| | Chi-Square Value | 0.000 | 0.026 |
| | Degrees of Freedom | 1 | 1 |
| | Significance | 1.000 | .873 |
| Ethnicity | | | |
| White (%) | 55.4 | 48.3 | 53.1 |
| Black (%) | 25.1 | 33.6 | 28.4 |
| Hispanic (%) | 10.8 | 13.3 | 13.9 |
| Native American (%) | 5.0 | 1.4 | 1.4 |
| Asian or Pacific Islander (%) | 1.7 | 0.6 | 1.2 |
| Other (%) | 2.0 | 2.8 | 2.0 |
| Total (%) | 100.0 | 100.0 | 100.0 |
| | Chi-Square Value | 5.215 | 2.186 |
| | Degrees of Freedom | 5 | 5 |
| | Significance | .390 | .823 |
| Age | | | |
| 0-17 (%) | 2.0 | 2.1 | 2.6 |
| 18-59 (%) | 85.3 | 83.9 | 83.4 |
| 60 and over (%) | 12.7 | 14.0 | 14.0 |
| Total (%) | 100.0 | 100.0 | 100.0 |
| | Chi-Square Value | 0.043 | .261 |
| | Degrees of Freedom | 2 | 2 |
| | Significance | .979 | .878 |
| Closure Code | | | |
| A. Counsel and Advice (%) | 49.2 | 52.8 | 48.3 |
| B. Brief Service (%) | 19.7 | 17.4 | 17.9 |
| C. Referred after Legal Assessment (%) | 2.3 | 1.9 | 2.4 |
| D. Insufficient Merit to Proceed (%) | 1.3 | 1.2 | 1.4 |
| E. Client Withdrew or Did Not Return (%) | 5.6 | 4.4 | 5.9 |
| F. Settled without Litigation (%) | 2.4 | 2.0 | 2.6 |
| G. Settled with Litigation (%) | 3.5 | 3.3 | 3.6 |
| H. Administrative Agency Decision (%) | 4.3 | 4.7 | 4.7 |
| I. Court Decision (%) | 9.2 | 10.0 | 10.2 |
| J. Change in Eligibility Status (%) | 0.4 | 0.4 | 0.6 |
| K. Other (%) | 2.1 | 1.9 | 2.4 |
| Total (%) | 100.0 | 100.0 | 100.0 |
| | Chi-Square Value | 1.107 | 1.474 |
| | Degrees of Freedom | 10 | 10 |
| | Significance | .999 | .999 |

Note: For a sample to be statistically different from the population, the significance must be less than 0.05. Data Call 1 included Sample A grantees; Data Call 2 included both Samples A and B grantees.

Exhibit C-2.
Logistic Regression Comparison of Data from Sample A with
Grantee Population

| Variables in the Equation | <i>B</i> | Degrees of Freedom | Significance |
|---|-----------------|---------------------------|---------------------|
| Constant | -2.270 | 1 | .00 |
| Variables <u>NOT</u> in the Equation | Score | Degrees of Freedom | Significance |
| Gender | | | |
| Men | .01 | 1 | .91 |
| Women | .01 | 1 | .91 |
| Ethnicity | | | |
| White | 1.35 | 1 | .25 |
| Black | 1.80 | 1 | .18 |
| Hispanic | .87 | 1 | .35 |
| Native American | .91 | 1 | .34 |
| Asian or Pacific Islander | .32 | 1 | .57 |
| Other | .66 | 1 | .42 |
| Age | | | |
| 0-17 | .05 | 1 | .83 |
| 18-59 | 1.29 | 1 | .25 |
| 60 and over | .20 | 1 | .27 |
| Closure Code | | | |
| A. Counsel and Advice | 2.28 | 1 | .13 |
| B. Brief Service | .04 | 1 | .83 |
| C. Referred after Legal Assessment | .16 | 1 | .69 |
| D. Insufficient Merit to Proceed | 1.24 | 1 | .27 |
| E. Client Withdrew or Did Not Return | 1.98 | 1 | .16 |
| F. Settled without Litigation | 2.05 | 1 | .15 |
| G. Settled with Litigation | .45 | 1 | .50 |
| H. Administrative Agency Decision | .02 | 1 | .88 |
| I. Court Decision | .78 | 1 | .38 |
| J. Change in Eligibility Status | .61 | 1 | .44 |
| K. Other | .45 | 1 | .50 |
| Omnibus Test of Model Coefficients | Step | Block | Model |
| Chi-Square Value | 13.61 | 13.61 | 13.61 |
| Degrees of Freedom | 18 | 18 | 18 |
| Significance | .76 | .76 | .76 |

Note: For a sample to be statistically different from the population, the significance of the omnibus test of model coefficients must be less than 0.05. Data Call 1 included only Sample A grantees, $n = 30$.

Exhibit C-3.
Logistic Regression Comparison of Combined Samples A and B
With Grantee Population

| Variables in the Equation | <i>B</i> | Degrees of Freedom | Significance |
|---|-----------------|---------------------------|---------------------|
| Constant | -1.482 | 1 | .00 |
| Variables <u>NOT</u> in the Equation | Score | Degrees of Freedom | Significance |
| Gender | | | |
| Men | .09 | 1 | .76 |
| Women | .10 | 1 | .76 |
| Ethnicity | | | |
| White | .20 | 1 | .66 |
| Black | .38 | 1 | .54 |
| Hispanic | 1.67 | 1 | .20 |
| Native American | 2.10 | 1 | .15 |
| Asian or Pacific Islander | .03 | 1 | .87 |
| Other | .00 | 1 | 1.00 |
| Age | | | |
| 0-17 | 1.83 | 1 | .18 |
| 18-59 | 2.66 | 1 | .10 |
| 60 and over | 1.49 | 1 | .22 |
| Closure Code | | | |
| A. Counsel and Advice | 4.65 | 1 | .03 |
| B. Brief Service | .01 | 1 | .92 |
| C. Referred after Legal Assessment | .24 | 1 | .63 |
| D. Insufficient Merit to Proceed | 2.73 | 1 | .10 |
| E. Client Withdrew or Did Not Return | 1.69 | 1 | .19 |
| F. Settled without Litigation | .26 | 1 | .61 |
| G. Settled with Litigation | 2.86 | 1 | .09 |
| H. Administrative Agency Decision | .20 | 1 | .66 |
| I. Court Decision | 4.02 | 1 | .04 |
| J. Change in Eligibility Status | 1.06 | 1 | .30 |
| K. Other | .14 | 1 | .71 |
| Omnibus Test of Model Coefficients | Step | Block | Model |
| Chi-Square Value | 18.98 | 18.98 | 18.98 |
| Degrees of Freedom | 18 | 18 | 18 |
| Significance | .39 | .39 | .39 |

Note: For a sample to be statistically different from the population, the significance of the omnibus test of model coefficients must be less than 0.05. Data Call 2 include both Samples A and B grantees, $n=60$.

Exhibit C-4.
Comparison of On-site Reviewed Cases with Aggregate Set of Cases
(Based on Data from 30 Sample A Grantees)

| | Aggregate Set of Cases (n= 277,155) | On-site Reviewed Cases (n= 725) |
|--|--|--|
| Problem Category | | |
| Consumer/Finance (%) | 9.2 | 12.5 |
| Education (%) | 1.9 | 1.2 |
| Employment (%) | 3.2 | 2.3 |
| Family (%) | 35.8 | 37.1 |
| Juvenile (%) | 1.5 | 1.7 |
| Health (%) | 3.2 | 2.9 |
| Housing (%) | 22.4 | 18.9 |
| Income Maintenance (%) | 13.5 | 14.7 |
| Individual Rights (%) | 1.6 | 1.3 |
| Miscellaneous (%) | 7.7 | 7.4 |
| Total (%) | 100.0 | 100.0 |
| Chi-Square Value | | 1.923 |
| Degrees of Freedom | | 9 |
| Significance | | .993 |
| Closure Code | | |
| A. Counsel and Advice (%) | 48.3 | 48.2 |
| B. Brief Service (%) | 22.2 | 19.0 |
| C. Referred after Legal Assessment (%) | 3.5 | 4.8 |
| D. Insufficient Merit to Proceed (%) | 1.0 | 0.8 |
| E. Client Withdrew or Did Not Return (%) | 4.6 | 5.6 |
| F. Settled without Litigation (%) | 1.8 | 1.7 |
| G. Settled with Litigation (%) | 3.2 | 3.5 |
| H. Administrative Agency Decision (%) | 4.4 | 4.7 |
| I. Court Decision (%) | 9.3 | 9.2 |
| J. Change in Eligibility Status (%) | 0.3 | 0.5 |
| K. Other (%) | 1.4 | 2.0 |
| Total (%) | 100.0 | 100.0 |
| Chi-Square Value | | 1.964 |
| Degrees of Freedom | | 10 |
| Significance | | .997 |

Note: For the sample of on-site reviewed cases to be statistically different from the aggregate set of cases submitted by the selected grantees, the significance must be less than 0.05.

Exhibit C.5.
Comparison of Error Rates for Advance-Notice and
No-Advance-Notice Sampled Cases

| | | Number of Closed Cases | | |
|---------------------------|----------|------------------------|-------------------------|-------|
| | | With No Errors | With One or More Errors | Total |
| Sample Group | 1 | 638 | 87 | 725 |
| | 2 | 127 | 18 | 145 |
| Total | | 765 | 105 | 870 |
| Chi-Square Value | | | | 0.019 |
| Degrees of Freedom | | | | 1 |
| Significance | | | | 0.889 |

Note: For Group 1 to be statistically different from Group 2, the significance must be less than 0.05.